

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,) INDICTMENT *CR 13-242 PAM/JJK*
)
Plaintiff,) 18 U.S.C. § 2
) 18 U.S.C. § 981(a)(1)(C)
v.) 28 U.S.C. § 2461(c)
) 29 U.S.C. § 501(c)
1. ELIZABETH N. BRANCA and)
2. LAURIE J. HOFFMAN,)
)
Defendants.)

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1
(Embezzlement and Theft of Labor Union Assets)

During the period from in and about January 2009 to in and about April 2012, in the State and District of Minnesota, the defendants,

**ELIZABETH N. BRANCA and
LAURIE J. HOFFMAN,**

each aiding and abetting the other, while employed as the Business Manager and Bookkeeper, respectively, of the Office of Professional Employees Local 12, a labor organization engaged in an industry affecting commerce, did intentionally embezzle, steal and unlawfully and willfully abstract and convert to their own use and the use of another the moneys, funds, and other assets of said labor organization in the approximate amount of \$25,456.05, in violation of Title 29, United States Code, Section 501(c).

SCANNED

OCT 08 2013

U.S. DISTRICT COURT ST. PAUL

United States v. Elizabeth N. Branca, et al.

FORFEITURE ALLEGATIONS

Count 1 of this Indictment is realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

As the result of the offense alleged in Count 1 of this Indictment, the defendants shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the defendants' violations of Title 29, United States Code, Section 501(c).

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p) as incorporated by Title 28, United States Code, Section 2461(c).

All pursuant to Title 18, United State Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

A TRUE BILL

ACTING UNITED STATES ATTORNEY

FOREPERSON